

#### REMARKS

Claims 1-30 are pending in the application. Claims 1, 14, 16 and 29 are independent.

Claims 3, 9, 10, 12, 13, and 18 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject which applicant regards as the invention. While the Applicant believes that these claims are definite as written, in order to expedite allowance, they have been amended to eliminate what the Examiner believes to be confusing.

Claims 1-30 stand rejected under 35 U.S.C. §103(a) as obvious over Davies in view of Yamamoto. The Examiner states that Davies teaches all of the invention but for two points: the storing of images on the client rather than the server and the transmission of image identity (rather than image itself) from the client to the server. With regard to the former point, the Examiner relies on Yamamoto as teaching locally stored images and states that combining Yamamoto with Davies would improve Davies "by allowing the client to store the desired data that requires large amount of memory." With regard to the latter point, the Examiner states that it would have been obvious to transmit image identity (rather than image itself) from the client to the server "because without

sending the data to the server, the server can not able [sic.] to determine whether the client is allowed or denied to access the resource."

The Davies reference was cited by the applicant and has been discussed in detail in prior amendments. The Yamamoto reference is cited for the first time in Paper No. 18. Yamamoto describes a "secret data storage device, secret data reading method, and control program storing medium." Yamamoto discloses a single embodiment which includes a single CPU coupled to various local memory, a display and a keyboard. The keyboard includes character keys, hieroglyphic keys, and color keys. The memory includes a character font and an hieroglyphic font. The hieroglyphic font shown includes simple images of animals and fruit. The description of the hieroglyphic font mentions animals, food, vehicles and seasons.

With regard to the combination of Yamamoto with Davies as proposed by the Examiner, Yamamoto does not disclose or suggest a password access from a client to a server. Yamamoto discloses only a single stand-alone device to which access is obtained by selecting among images stored on the same device. In other words, in Yamamoto, **the images are stored on the device to which access is sought**. This is the same as in the Davies patent where the images are stored on the server to which the client

seeks access. However, in the present case, what is being claimed is to locate images on a client which is seeking access to a remote server. There is no teaching or suggestion in Yamamoto or Davies to store images on any device other than the device to which access is desired. Thus, it is not seen in the art of record where the suggestion is to locate images on a client which uses the images to access a remote server. Moreover, the Examiner's stated incentive for combining the references is irrelevant. The purpose for storing images on the client rather than the server is not to economize memory on the server. It is to economize bandwidth between the client and the server so that the images do not have to be transmitted from the server to the client every time the client attempts to access the server. Since Yamamoto is not concerned with a network connection in any way, Yamamoto has no concern for the bandwidth of a connection between two computers. There is no teaching in Yamamoto to locate the hieroglyphic font on any device other than the one to which access is sought.

With regard to the second point, the Examiner has failed to appreciate the difference between the transmission of image data and image identification data. The difference is explained throughout the instant specification and has been explained several times in prior amendments and during conversations with the Examiner. While it is true that the system in the Davies

patent could not make an access determination without some data being transmitted from the client to the server, this does not qualify as a teaching or suggestion that the data transmitted should not be image data but should be, instead, an identification of an image.

For these reasons alone, the obviousness rejection of the independent claims must fail and it is unnecessary to discuss the dependent claims. However, the Applicant will point out a few errors made by the Examiner in rejecting the dependent claims.

As to claim 3, the portion of Davies cited by the Examiner does not teach or suggest the limitations of claim 3. The same can be said of claims 18, 27 and 28.

As to claim 4, the portions of Davies cited by the Examiner do not teach or suggest the limitations of claim 4. The same can be said for claims 10, 11, and 19.

The portions of Davies cited by the Examiner in rejecting claims 12 and 13 do not teach or suggest exactly what is being claimed in claims 12 and 13 which deal with both present and subsequent selection of images.

In light of all of the above, it is submitted that all of the claims are in order for allowance, and prompt allowance is earnestly requested. Should any issues remain outstanding, the Examiner is invited to call the undersigned attorney of record so that the case may proceed expeditiously to allowance.

Respectfully submitted,

A handwritten signature in cursive script, reading "David P. Gordon".

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